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May 15, 2023

Via ECF

The Honorable Vera M. Scanlon
United States Magistrate Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 21-cv-05716-AMD-VMS
Corrected

Dear Judge Scanlon:

My firm represents the Plaintiffs in the above-captioned action. We submit this letter jointly with counsel for Defendants, in compliance with this Court's May 15, 2023 order and Judge Donnelly's May 13, 2023 order. The parties have met and conferred concerning a proposed schedule for jurisdictional discovery, and have agreed upon the following:

- May 15, 2023: Deadline for Defendants to serve objections to Plaintiffs' Interrogatories and Requests for Production ("RFPs") that were served on April 13, 2023.
- May 22, 2023: Deadline for Plaintiffs to move to compel based upon Defendants' written objections only.
- May 25, 2023: Deadline for Defendants to respond to Plaintiffs' motion to compel.
- June 30, 2023: Deadline for Defendants to complete their productions of documents in response to RFPs for which Defendants have no objection or otherwise upon which the parties reach agreement.
- July 15, 2023: Deadline for Defendants to complete their responses to Plaintiffs' Interrogatories.

Respectfully submitted,

/s/ Patrick L. Rocco